

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

In re: Roxanne Lynne Herceg
Debtor

Case No. 17-21194 TPA
Chapter 13

JP Morgan Chase Bank, N.A.
Movant

v.

Roxanne Lynne Herceg, Ronda J.
Winnecur, Esq., Trustee
Respondents

**DECLARATION OF DEBTOR IN RESPONSE TO
NOTICE OF MORTGAGE PAYMENT CHANGE**

Debtor Roxanne Lynne Herceg, by her attorneys Catherine T. Martin and Neighborhood Legal Services Association, hereby states:

1. The debtor's plan dated March 28, 2017 includes the increase in mortgage payment to \$327.56.
2. The debtor does not object to the proposed mortgage payment change.
3. The debtor's plan, which was given an interim confirmation on April 27, 2017, is sufficient to fund the plan with the modified debt.

Respectfully submitted,

/s/Catherine T. Martin
Attorney for Debtor/Movant
Pa. I.D. #29049; Firm #213
NLSA, 928 Penn Avenue, Pittsburgh, PA 15222
(412) 586-6118; Email: martinc@nlsa.us

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

In re: Roxanne Lynne Herceg
Debtor

Case No. 17-21194 TPA
Chapter 13

JP Morgan Chase Bank, N.A.
Movant

v.

Roxanne Lynne Herceg, Ronda J.
Winnecur, Esq., Trustee
Respondents

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the Debtor's Declaration in response to Notice of Mortgage Payment Change on the following individuals by Notice of Electronic Filing, on the date stated below:

James Warmbrodt on behalf of Creditor JPMORGAN CHASE BANK, NATIONAL ASSOCIATION: bkgroup@kmlawgroup.com

Ronda J. Winnecur, Chapter 13 Trustee
cmevf@chapter13trusteevdpa.com

Office of the United States Trustee
ustpregion03.pi.ecf@usdoj.gov

And by first class mail to:

Ashley Hubbart
JP Morgan Chase Bank, NA
Chase Records Center; Attn: Correspondence Mail
Mail Code LA4-5555
700 Kansas Lane
Monroe, LA 71203

Date: 5/22/17

/s/ Catherine T. Martin
Pa. I.D. No. 29049; Firm No. 213
NEIGHBORHOOD LEGAL SERVICES
ASSOCIATION
928 Penn Avenue
Pittsburgh, PA 15222
(412) 586-6118; martinc@nlsa.us